

THE ROSEN LAW FIRM, P.A.

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Class counsel for Plaintiffs

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

VINH NGUYEN, INDIVIDUALLY
AND ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED,

Plaintiff,

v.

RADIANT PHARMACEUTICALS
CORPORATION AND DOUGLAS C.
MACLELLAN,

Defendants.

CASE No.: CV-11-0406-DOC
(MLGx)

CLASS ACTION

**LEAD PLAINTIFFS' NOTICE OF
MOTION AND MOTION FOR AN
AWARD OF ATTORNEYS' FEES
AND REIMBURSEMENT OF
EXPENSES AND AWARD TO
PLAINTIFFS**

Judge: Hon. David O. Carter
Courtroom: 9D
Hearing Date: April 22, 2014
Hearing Time: 8:30 a.m.

1 TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

2 PLEASE TAKE NOTICE that, pursuant to Court's Preliminary Approval and
 3 Notice Order of January 31, 2014 (dkt. # 130), on April 22, 2014 at 8:30 a.m., or
 4 as soon thereafter as counsel may be heard, at the Ronald Reagan Federal
 5 Building and U.S. Courthouse, 411 West Fourth Street, Santa Anna, CA 92701,
 6 before the Honorable David O. Carter, United States District Judge, Lead
 7 Plaintiffs, through their Counsel, will move pursuant to Fed. R. Civ. P. 23(e) for
 8 an Order: (1) awarding attorneys' fees in the amount of \$700,000 and awarding
 9 Lead Plaintiffs \$6,000 (\$2,000 each); (2) reimbursing \$421,689.87 in expenses
 10 that were incurred in prosecuting this action. Lead Plaintiffs' motion is based on
 11 the Memorandum of Law in Support; the Declaration of Laurence M. Rosen in
 12 Support of Lead Plaintiffs' Motion for Final Approval of Class Action
 13 Settlement and Plan of Allocation, and Award of Attorneys' Fees and
 14 Reimbursement of Expenses; the Stipulation and Agreement of Settlement dated
 15 December 16, 2013; and all other pleadings and matters of record and such
 16 additional evidence or argument as may be presented at the hearing. A
 17 [Proposed] Order approving the requested award of attorneys' fees and expenses
 18 is filed herewith.

19 DATED: March 24, 2014

Respectfully submitted,

21 **THE ROSEN LAW FIRM P.A.**

22 /s/ Laurence M. Rosen
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Lead Counsel for Lead Plaintiffs and the
Class

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1 **CERTIFICATE OF SERVICE**

2 I, Laurence M. Rosen, hereby declare under penalty of perjury as follows:

3 I am the managing attorney of the Rosen Law Firm, P.A. I am over the age
4 of eighteen.

5 On March 24, 2014, I electronically filed the attached **LEAD**
6 **PLAINTIFFS' NOTICE OF MOTION AND MOTION IN SUPPORT OF**
7 **FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND PLAN OF**
8 **ALLOCATION** with the Clerk of the Court using the CM/ECF system which
9 sent notification of such filing to counsel of record.

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11 Executed on March 24, 2014

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14 /s/ Laurence Rosen
15 Laurence M. Rosen
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